

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)

v.)

No. 07 CR 862

GABRIEL DRAGOS TOADER,)
also known as "Gabi Camatar")

Violations: Title 18, United States
Code, Sections 1343 and 2

BELA BALINT,)
also known as "Bebe,")

JUDGE KENNELLY

CRISTINA SAVU,)
IGORI GOREACIUC,)
also known as "Papa,")

MAGISTRATE JUDGE SCHENKIER

ADRIAN GHIGHINA,)
also known as "Rusu,")

SUPERSEDING INDICTMENT

ADRIAN DUCA,)
RAUL BORLEA,)

MIRCEA ALIN BLAJ,)
also known as "Piticul,")

IOAN DANUT COITA,)
CONSTANTIN PALANCEANU,)

also known as "Costel," and)
ANDREI OVIDIU AGACHE)

FILED

AUG 28 2008 TC
AUG 28, 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

COUNTS ONE THROUGH FORTY-EIGHT

The SPECIAL JUNE 2007 GRAND JURY charges:

1. At times relevant to this indictment:

a. Internet auctions sites, such as eBay, and other internet-based sales forums, provided the opportunity to buy and sell items over the internet. Sellers would transmit information by computer to the site describing the property for sale and inviting bids on the property. Potential purchasers would transmit offers by computer to purchase the items for sale.

b. In the case of eBay, the highest bidder for a particular item was

declared the winner of the auction and afforded the opportunity to purchase the item for the price of the winning bid. In those instances in which the winning bidder failed to complete his or her purchase of an item, the seller could elect to transmit to previous bidders through eBay a "second chance offer" to purchase the item for the price of their prior bid.

c. Western Union engaged in the business of transferring money by wire throughout the United States and foreign countries and assigned a unique money transfer control number, also known as an "MTCN," to each request by a customer to transmit funds. Western Union agents were generally co-located with other businesses, such as convenience stores and currency exchanges.

d. Western Union generally required a sender of funds to complete a form providing the amount of money to be sent and the name and location of the individual receiving the funds. After receiving the sender's funds and processing the form, Western Union provided the MTCN assigned to the transaction to the sender of the funds.

e. Western Union generally required a recipient of funds to complete a form providing the amount of money to be received, the name and location of the individual sending the funds. In addition, the recipient could provide the MTCN number assigned by Western Union to the transaction. Western Union agents typically required those receiving a high-dollar wire transfer to present a form of photographic identification, such as a driver's license or passport, when receiving the funds.

f. All Western Union wire transfers involved transmission of data in interstate commerce. When a sender of funds initiated a wire transfer, data relating to the transaction was transmitted from the originating Western Union agent to a computer server located in either Missouri or Texas, and was then transmitted to another Western Union computer server located in North Carolina. When the recipient of a wire transfer picked up the money from Western Union, data relating to the transaction was transmitted between the receiving Western Union agent and the respective Western Union computer server in Missouri or Texas.

g. Defendants and co-schemers maintained accounts at various financial institutions in their own true names, in aliases names, and in the names of fictitious businesses, as further described below:

i. Defendant GABRIEL DRAGOS TOADER maintained accounts in Chicago, Illinois, in his own true name and in the name of TDG Consulting LLC at Bank of America and at J.P. Morgan Chase.

ii. Defendant RAUL BORLEA maintained accounts in Chicago, Illinois, in his own true name at Washington Mutual Bank; and in his own true name and the name of Arga Construction LLC at Bank of America.

iii. Defendant CRISTINA SAVU maintained accounts in Chicago, Illinois, in her own true name at LaSalle Bank, Bank of America, and J.P. Morgan Chase. SAVU also maintained bank accounts in alias names, such as "Elena Kashimitros" at J.P. Morgan Chase and Bank of America, in Chicago,

Illinois; and "Alissa Wonderbarch" and "Maria Miche" at Bank of America, in Chicago, Illinois.

iv. Defendant IGORI GOREACIUC maintained accounts in alias names at various financial institutions, such as "Kostas Koralis" and "Alexander Dore" at J.P. Morgan Chase and Bank of America, in New York, New York; "Andre Gotini" at J.P. Morgan Chase, in New York, New York; "Alexander Charelle" at Washington Mutual Bank and Bank of America, in Ft. Lauderdale, Florida; and "Rene Goltier" at Bank of America, in Dania Beach, Florida.

v. Co-schemer Bogdan Ganescu maintained a joint account in his true name at J.P. Morgan Chase, in Elk Grove Village, Illinois.

h. Financial accounts were maintained at Alpha Bank Limited in the Republic of Cyprus in the name of Kazira LLC and AFMA Corporation.

2. Between approximately November 2004 and March 2008, in the Northern District of Illinois, and elsewhere,

GABRIEL DRAGOS TOADER,
BELA BALINT,
CRISTINA SAVU,
IGORI GOREACIUC,
ADRIAN GHIGHINA,
ADRIAN DUCA,
RAUL BORLEA,
MIRCEA ALIN BLAJ,
IOAN DANUT COITA,
CONSTANTIN PALANCEANU, and
ANDREI OVIDIU AGACHE,

defendants herein, along with Mihai Bledea, Cristian Bentan, Igor Aslan, Gabriel Constantin, Bogdan Ganescu, Puica Dorin, and others known and unknown to the

Grand Jury, knowingly devised and participated in a scheme to defraud, and to obtain money by means of materially false and fraudulent pretenses, representations, and promises.

3. It was part of the scheme that individuals located outside of the United States, principally in Romania (the "Foreign Co-schemers"), fraudulently posed as legitimate sellers of goods from sites such as eBay on the internet. By posing as sellers of goods on the internet, the Foreign Co-schemers caused approximately 1,100 victims in the United States and abroad to wire transfer funds via Western Union to the defendants and other co-schemers in amounts totaling approximately \$ 2,700,000 for items that were never delivered to the victims.

4. It was further part of the scheme that the Foreign Co-schemers posed as legitimate sellers on-line through various fraudulent means, such as: (i) unauthorized use ("hijacking") of legitimate internet auction accounts, (ii) creating internet solicitations designed to appear as if they had originated from legitimate internet sites such as eBay, (iii) transmitting false "second chance offers" to users of eBay, (iv) falsely representing themselves as sellers who were located in the United States, (v) falsely representing that internet transactions were "insured" by internet sites such as eBay and Square Trade, (vi) falsely representing that funds transmitted by the buyers would be held in "escrow" or "purchase protection accounts" to guard against fraud, and (vii) falsely promising to sell items over the internet that the Foreign Co-schemers would not deliver.

5. It was further part of the scheme that defendants knowingly agreed to

receive fraud proceeds generated by the Foreign Co-schemers from Western Union agents at various locations throughout the United States, principally in and around Chicago, Illinois. At various time, defendants and co-schemers also received funds in southern Florida; Dallas, Texas; New York, New York; and Los Angeles, California. Defendants and their co-schemers did so in exchange for a percentage of the fraud proceeds, generally 20% to 40%, generated by the Foreign Co-schemers.

6. It was further part of the scheme that in order to receive and transmit fraud proceeds generated by the Foreign Co-schemers, defendants GABRIEL DRAGOS TOADER, BELA BALINT, CRISTINA SAVU, IGORI GOREACIUC, ADRIAN GHIGHINA, RAUL BORLEA, MIRCEA ALIN BLAJ, IOAN DANUT COITA, ADRIAN DUCA, CONSTANTIN PALANCEANU, ANDREI OVIDIU AGACHE, and co-schemers such as Puica Dorin, Paul Vadineanu, Mihai Bledea, Cristian Bentan, Igor Aslan, and others known and unknown to the Grand Jury, established aliases by obtaining and using false identification documents, such as driver's licenses, state identification cards, and social security cards, and passports, in names that did not reflect their true identities. The alias names and false identification documents employed by defendants and their co-schemers included the following:

True name	False identification documents
BELA BALINT	Dan Ackerman, George Brown, George Blumann, George Goodman, Thomas Irwin, Paul Schultzer, Tony Sharp, Kevin Walker, Toni Walker

True name	False identification documents
CRISTINA SAVU	Elena Kashimitros, Michele Keolman, Gretta Kollman, Maria Miche, Maya Morritz, Dana Schawrzmann, Dana Shotzwann, Klaudia Vanboritz, Eryka Wandez, Alissa Wonderbarch
IGORI GOREACIUC	Victor Armand, Alexander Bengois, Alexander Bernois, Alexander Berois, Iv Brochet, Alexander Charelle, Andre Corynt, Robert Devi, Alexander Dore, Robert Dore, Rene Goltier, Andre Gotini, Kostas Karalis, Victor Lorent, Ciuculescu Marian, George Popesco, Alexander Vernois
ADRIAN GHIGHINA	Dan Anderson, Andre Beauville, Daniel Derolent, Dariel Dugurant, Dan Flinchum, Cosmin Pavel, Andre Motoc, Dan Schaffman, Dan Schaufman, Dan Schneider, Maurice Schulzer, Klauss Schwebel, Kraus Schwubel, Klaus Schwubrer, Maurice Schuman, Dan Smith, Kristian Soren
RAUL BORLEA	Michael Polaceks
MIRCEA ALIN BLAJ	Paul Barbu, Popa Claudiu, Daniel Codrea, Mot Florin, Manea Mihai, Ioan Mihalcea, Dumitru Pavel, Daniel Schmucker, Daniel Schmuker, Hagi Sorin
IOAN DANUT COITA	Avi Dubrovitz, Ben Malvitz, Ben Rukovitz, Daniel Zelea, Frank Pisani, Frank Valoni Jim Perkovitz, Luciano Bergoli, Luigi Batoni, Mark Spadoni, Peter Klaus, Zolt Capris
ADRIAN DUCA	Arthur Morris, Joice Fetherling
CONSTANTIN PALANCEANU	Paul Dregen, Vladimir Igorov, Joseph Ludovckys, Andrew Robenstein, Paul Schneider, Vlad Shulzer
ANDREI OVIDIU AGACHE	Paul Acker, Paul Depner, Andrew Veres, Paul Verner

True name	False identification documents
Puica Dorin	Andy Rugero, David Calmorre, Peter Haintz, Frank Malkovitz, Raimar Nicolaus, Jill Roland
Paul Vadineanu	Paul Nachtman, Paul Natchman
Gabriel Constantin	Marco Patresse
Mihai Bledea	Daniel Allerman, Robert Brannik, Alex Clapton, James Devaro, David Goldman, Daniel Hassel, James Hastings, Andrew Hofferma, Michael Horner, Scott Jenken, Michael Krups, Vladimir Mysik, David Sherman, David Shuman, Dan Sullivan, Anthony Verlofsky
Cristian Bentan	Alberto Bagio, Alberto Biagioli, Paul Bigotti, Adam Binder, Giuliano Biggato, Paul Bigotti, Roberto Fiorenza, Carlo Gallo, Paulo Novalli, Luciano Pirogi, Tony Pirollo, Michael Robenstein, John Reynolds, Paul Silaghi, Nick Thomas, Alex Wagner
Igor Aslan	Peter Bergen, Michael Faragot, Antonio Fargas, Omar Ladislau, John Richard, William Rogers, Tam Silverado, Karl Wagner, Edmund Wolf

7. It was further part of the scheme that defendant GABRIEL DRAGOS TOADER and others caused the aliases to be communicated to the Foreign Co-schemers in order to enable the Foreign Co-schemers to incorporate the alias names into the fraudulent internet solicitations. Defendants and the Foreign Co-schemers did so in order to identify the names of the individuals to whom the victims should transmit their funds.

8. It was further part of the scheme that the Foreign Co-schemers caused

the victims to wire transfer funds via Western Union to the defendants in Chicago, Illinois, and other places, and caused the victims to provide the Foreign Co-schemers with the information necessary to obtain the victims' funds from Western Union, generally the name of the sender of the funds, the amount of funds transferred, the originating city, and the MTCN assigned by Western Union to the transaction.

9. It was further part of the scheme that the Foreign Co-schemers, after concluding fraudulent internet sales transactions and receiving the transactional data relating to Western Union wire transfers from the victims, caused the transactional data to be communicated to the United States, generally by text message, in order to enable the defendants and other co-schemers to receive the victims' funds from Western Union agents. The Foreign Co-schemers generally transmitted the transactional information to defendant GABRIEL DRAGOS TOADER in Chicago, Illinois, or others identified to the Foreign Co-schemers by TOADER.

10. It was further part of the scheme that after the Foreign Co-schemers had transmitted the Western Union transactional data to the United States, defendant GABRIEL DRAGOS TOADER directed co-defendants BELA BALINT, CRISTINA SAVU, IGORI GOREACIUC, ADRIAN GHIGHINA, RAUL BORLEA, MIRCEA ALIN BLAJ, CONSTANTIN PALANCEANU, ANDREI OVIDIU AGACHE, IOAN DANUT COITA, co-schemers such as Puica Dorin, Mihai Bledea, Cristian Bentan, and others to receive the fraud proceeds from Western Union

agents using alias identification documents, principally in the vicinity of Chicago, Illinois. At times, the defendants received funds in southern Florida, and in the vicinity of cities such as Dallas, Texas; New York, New York; and Los Angeles, California.

11. It was further part of the scheme that defendants GABRIEL TOADER, BELA BALINT, IGORI GOREACIUC, ADRIAN GHIGHINA, RAUL BORLEA, MIRCEA ALIN BLAJ, IOAN DANUT COITA, and others, such as Bogdan Ganescu and Puica Dorin, agreed to travel from the vicinity of Chicago, Illinois, to states such as Texas and Florida to engage in the receipt and transfer of funds sent by victims of the scheme.

12. It was further part of the scheme that defendant GABRIEL DRAGOS TOADER knowingly caused counterfeit identification documents depicting defendants and co-schemers to be manufactured in Chicago, Illinois, and caused the counterfeit documents to be delivered to defendants and co-schemers participating in the scheme in the vicinity of Dallas, Texas and southern Florida.

13. It was further part of the scheme that defendants falsely represented their identities to Western Union agents and others when receiving proceeds from the fraudulent internet sales transactions, using alias names, false social security numbers, false telephone numbers, false addresses, and false and counterfeit identification documents, such as drivers licenses purportedly issued by states such as Arizona, California, Indiana, Iowa, Michigan, New York, Ohio, Texas, Virginia, and Wisconsin; and passports purportedly issued by countries such as Greece,

Norway, and Belgium.

14. It was further part of the scheme that in some instances the Foreign Co-schemers caused the victims to wire transfer funds to the defendants and other co-schemers through MoneyGram, or through wire transfers to bank accounts established by the defendants in alias names.

15. It was further part of the scheme that defendants shared information on Western Union and MoneyGram agents, and frequented the same agent locations when transmitting and receiving fraud proceeds.

16. It was further part of the scheme that after receiving the victims' funds and retaining a portion for their own use and benefit, defendants BELA BALINT, CRISTINA SAVU, IGORI GOREACIUC, ADRIAN GHIGHINA, ADRIAN DUCA, RAUL BORLEA, MIRCEA ALIN BLAJ, IOAN DANUT COITA, CONSTANTIN PALANCEANU, and ANDREI OVIDIU AGACHE, delivered the balance of the fraud proceeds in a variety of ways to defendant GABRIEL DRAGOS TOADER and the Foreign Co-schemers.

17. It was further part of the scheme that defendant GABRIEL DRAGOS TOADER caused co-defendants and co-schemers, such as RAUL BORLEA, BELA BALINT, and Cristian Bentan, to deposit funds received from victims of the scheme into financial accounts that he maintained in his own true name, and in the name of TDG Consulting LLC, at Bank of America and J.P. Morgan Chase, in Chicago, Illinois.

18. It was further part of the scheme that defendants agreed to cause a

portion of the fraud proceeds, generally around 60%, to be transmitted in interstate commerce outside of the United States to the Foreign Co-schemers and others, generally via bank wire, MoneyGram, or Western Union transfers. Defendants frequently made these wire transfers using aliases names and effectuated the wire transfers through bank accounts maintained in the name of non-existent businesses.

19. It was further part of the scheme that defendant GABRIEL DRAGOS TOADER collected victims' funds from others, such as defendants BELA BALINT, CRISTINA SAVU, IGORI GOREACIUC, ADRIAN GHIGHINA, CONSTANTIN PALANCEANU, ANDREI OVIDIU AGACHE, RAUL BORLEA, MIRCEA ALIN BLAJ, IOAN DANUT COITA, and co-schemers such as Mihai Bledea, Cristian Bentan. After retaining a portion of the victims' funds for his own use and benefit, TOADER caused the victims' funds to be transmitted in interstate and foreign commerce to the Foreign Co-schemers and others. These wire transfers generally originated from financial accounts, Western Union agents, and MoneyGram agents located in the vicinity of Chicago, Illinois.

Kazira LLC

20. It was further part of the scheme that on or about August 12, 2005, defendant ADRIAN DUCA and co-conspirator Mihai Bledea caused fraud proceeds totaling approximately \$9,900 to be transmitted from a bank account at TCF Bank in Chicago, Illinois, to an account maintained in the name of Kazira LLC at Alpha Bank Limited in the Republic of Cyprus.

21. It was further part of the scheme that between approximately August 2, 2005, and March 21, 2006, defendant GABRIEL DRAGOS TOADER caused victim funds totaling approximately \$308,000 to be transmitted from bank accounts that he maintained in Chicago, Illinois, in his own true name and in the name of TDG Consulting LLC, to an account maintained in the name of Kazira LLC at Alpha Bank Limited in the Republic of Cyprus.

AFMA Corporation

22. It was further part of the scheme that between on or about the dates indicated, the following defendants transmitted and agreed to transmit fraud proceeds in amounts totaling approximately \$326,000 from bank accounts in the United States to an account maintained in the name of AFMA Corporation at Alpha Bank Limited in the Republic of Cyprus, as further specified below:

Defendant	Amount	Date	Bank Account
GABRIEL DRAGOS TOADER	\$ 50,000.00	04-20-06	JP Morgan Chase
GABRIEL DRAGOS TOADER	\$ 9,000.00	05-05-06	JP Morgan Chase
GABRIEL DRAGOS TOADER	\$ 13,000.00	05-10-06	JP Morgan Chase
GABRIEL DRAGOS TOADER	\$ 9,900.00	05-25-06	JP Morgan Chase
GABRIEL DRAGOS TOADER	\$ 9,900.00	05-31-06	JP Morgan Chase
CRISTINA SAVU	\$ 8,000.00	06-28-06	Bank of America
CRISTINA SAVU	\$ 8,000.00	06-28-06	JP Morgan Chase
CRISTINA SAVU	\$ 8,000.00	07-21-06	Bank of America
CRISTINA SAVU	\$ 8,500.00	08-09-06	JP Morgan Chase
CRISTINA SAVU	\$ 8,500.00	08-11-06	Bank of America
CRISTINA SAVU	\$ 8,000.00	08-11-06	JP Morgan Chase

RAUL BORLEA	\$ 8,115.00	08-16-06	Washington Mutual
RAUL BORLEA	\$ 8,050.00	09-05-06	Washington Mutual
RAUL BORLEA	\$ 8,050.00	09-06-06	Bank of America
RAUL BORLEA	\$ 8,415.00	10-05-06	Washington Mutual
GABRIEL DRAGOS TOADER	\$ 8,450.00	10-10-06	Bank of America
GABRIEL DRAGOS TOADER	\$ 8,000.00	10-12-06	Bank of America
GABRIEL DRAGOS TOADER	\$ 8,500.00	10-12-06	Bank of America
GABRIEL DRAGOS TOADER	\$ 8,350.00	10-19-06	Bank of America
GABRIEL DRAGOS TOADER	\$ 8,550.00	10-20-06	Bank of America
GABRIEL DRAGOS TOADER	\$ 9,000.00	10-30-06	Bank of America
GABRIEL DRAGOS TOADER	\$ 9,000.00	10-30-06	Bank of America
GABRIEL DRAGOS TOADER	\$ 11,000.00	10-31-06	Bank of America
GABRIEL DRAGOS TOADER	\$ 8,049.99	11-07-06	Bank of America
RAUL BORLEA	\$ 8,000.00	11-07-06	Bank of America
BOGDAN GANESCU	\$ 15,000.00	11-07-06	JP Morgan Chase
RAUL BORLEA	\$ 9,500.00	11-13-06	Washington Mutual
GABRIEL DRAGOS TOADER	\$ 8,350.00	11-13-06	Bank of America
GABRIEL DRAGOS TOADER	\$ 8,250.00	11-13-06	Bank of America
GABRIEL DRAGOS TOADER	\$ 9,500.00	11-27-06	Bank of America
BOGDAN GANESCU	\$ 15,000.00	11-29-06	JP Morgan Chase

Wire transfers to Romania

23. It was further part of the scheme that, in order to obtain, conceal, and retain the victims' funds, between on or about the dates indicated, the following defendants and co-schemers transmitted and agreed to transmit victims' funds from the vicinity of Chicago, Illinois, to Individual 1 in Romania, as further specified below:

Conspirator	Amount	Date
Mihai Bledea	\$ 4,950	10-20-05
Cristian Bentan	\$ 4,950	12-19-05
Cristian Bentan	\$ 5,000	01-25-06
GABRIEL DRAGOS TOADER	\$ 5,050	02-22-06
Cristian Bentan	\$ 5,000	03-06-06
GABRIEL DRAGOS TOADER	\$ 3,750	04-07-06
GABRIEL DRAGOS TOADER	\$ 4,500	04-11-06
GABRIEL DRAGOS TOADER	\$ 6,000	04-26-06
GABRIEL DRAGOS TOADER	\$ 4,600	05-03-06

24. It was further part of the scheme that between on or about the dates indicated, the following defendants transmitted and agreed to transmit victims' funds from the vicinity of Chicago, Illinois; and Dallas, Texas, to Individual 2 in Romania, as further specified below:

Conspirator	Amount	Date
GABRIEL DRAGOS TOADER (Illinois)	\$ 2,050	04-22-06
BELA BALINT (Illinois)	\$ 5,150	05-04-06
GABRIEL DRAGOS TOADER (Illinois)	\$ 3,400	05-08-06
BELA BALINT (Illinois)	\$ 4,500	05-16-06
RAUL BORLEA (Texas)	\$ 5,000	09-20-06
GABRIEL DRAGOS TOADER (Illinois)	\$ 8,000	10-24-06
ADRIAN GHIGHINA (Illinois)	\$ 7,000	10-30-06

25. It was further part of the scheme that between on or about the dates indicated, the following defendants transmitted and agreed to transmit victims'

funds from the vicinity of Dallas, Texas; and southern Florida, to Individual 3 in Romania, as further specified below:

Conspirator	Amount	Date
Paul Vadineanu (Texas)	\$ 2,000	01-23-07
MIRCEA ALIN BLAJ, aka "Popa Claudiu" (Texas)	\$ 2,900	01-30-07
IGORI GOREACIUC, aka "Ciuculescu Marian" (Florida)	\$ 2,900	02-19-07
MIRCEA ALIN BLAJ, aka "Popa Claudiu" (Texas)	\$ 2,900	02-20-07
IGORI GOREACIUC, aka "Ciuculescu Marian" (Florida)	\$ 2,900	02-20-07
MIRCEA ALIN BLAJ, aka "Codrea Daniel" (Texas)	\$ 2,340	02-21-07
MIRCEA ALIN BLAJ, aka "Hagiu Sorin" (Texas)	\$ 2,900	02-27-07
MIRCEA ALIN BLAJ, aka "Popa Claudiu" (Texas)	\$ 2,900	03-05-07
MIRCEA ALIN BLAJ, aka "Hagiu Sorin" (Texas)	\$ 2,900	03-12-07

26. It was further part of the scheme that between on or about the dates indicated, the following defendants and co-schemers transmitted and agreed to transmit victims' funds from the vicinity of Chicago, Illinois; Dallas, Texas; and southern Florida, to Individual 4 in Romania, as further specified below:

Conspirator	Amount	Date
GABRIEL DRAGOS TOADER (Illinois)	\$ 1,950	04-11-06
CRISTINA SAVU (Illinois)	\$ 6,205	06-21-06

Paul Vadineanu (Texas)	\$ 3,500	09-28-06
MIRCEA ALIN BLAJ, aka "Codrea Daniel" (Texas)	\$ 1,420	02-05-07
IOAN DANUT COITA (Texas)	\$ 7,663	03-01-07
IGORI GOREACIUC, aka "Marian Ciuculescu" (Florida)	\$ 2,900	03-11-07

27. It was further part of the scheme that at various times between February 2007 and April 2007, defendant ADRIAN GHIGHINA, using counterfeit identification documents manufactured in Chicago, Illinois, which falsely depicted him as "Cosmin Pavel" and "Andrei Motoc," wire transferred fraud proceeds totaling approximately \$18,000 through MoneyGram to individuals in Romania.

28. It was further part of the scheme that at various times between January 2007 and March 2007, defendant MIRCEA ALIN BLAJ, using counterfeit identification documents manufactured in Chicago, Illinois, which falsely depicted him as "Codrea Daniel," "Dumitru Pavel," "Florin Mot," "Popa Claudiu," and "Hagiu Sorin," wire transferred fraud proceeds totaling approximately \$82,000 through MoneyGram to individuals in Romania.

29. It was further part of the scheme that at various times between January 2007 and March 2007, defendant IGORI GOREACIUC, using counterfeit identification documents manufactured in Chicago, Illinois, which falsely depicted him as "Marian Ciuculescu" and "George Popesco," wire transferred fraud proceeds totaling approximately \$26,000 through MoneyGram to individuals in Romania.

Wire transfers of fraud proceeds to Romania to defendant TOADER's family members

30. It was further part of the scheme that, in order to obtain, conceal, and retain his share of funds derived from the scheme to defraud, defendant GABRIEL DRAGOS TOADER transmitted, and caused others to transmit, fraud proceeds to TOADER's family members in Romania through Western Union, MoneyGram, and bank wire transactions. These wire transfers generally originated from financial accounts, Western Union agents, and MoneyGram agents located in the vicinity of Chicago, Illinois.

29. It was further part of the scheme that between on or about the dates indicated, the following defendants and co-schemers transmitted and agreed to transmit fraud proceeds totaling approximately \$97,500 from the vicinity of Chicago, Illinois, and southern Florida, to relatives of defendant GABRIEL DRAGOS TOADER in Romania, as further specified below:

Conspirator	Amount	Date
GABRIEL DRAGOS TOADER	\$ 5,000	10-02-05
GABRIEL DRAGOS TOADER	\$ 1,500	10-10-05
Cristian Bentan	\$ 5,100	10-12-05
GABRIEL DRAGOS TOADER	\$ 5,100	10-19-05
GABRIEL DRAGOS TOADER	\$ 4,900	10-20-05
BELA BALINT	\$ 2,700	10-21-05
Cristian Bentan	\$ 3,250	10-21-05
Cristian Bentan	\$ 5,000	10-28-05
Cristian Bentan	\$ 2,901	12-20-05

GABRIEL DRAGOS TOADER	\$ 1,400	01-25-06
ANDREI OVIDIU AGACHE	\$ 5,000	01-31-06
BELA BALINT	\$ 5,000	01-31-06
ADRIAN GHIGHINA	\$ 5,000	01-31-06
ANDREI OVIDIU AGACHE, aka "Paul Acker"	\$ 5,000	02-13-06
GABRIEL DRAGOS TOADER	\$ 5,550	03-09-06
ANDREI OVIDIU AGACHE	\$ 6,000	03-12-06
GABRIEL DRAGOS TOADER	\$ 4,100	04-07-06
GABRIEL DRAGOS TOADER	\$ 7,000	04-12-06
GABRIEL DRAGOS TOADER	\$ 1,830	04-29-06
GABRIEL DRAGOS TOADER	\$ 9,900	05-25-06
ADRIAN GHIGHINA	\$ 9,500	11-16-06

Wire transfers of fraud proceeds to defendant TOADER

30. It was further part of the scheme that on or about March 11, 2006, defendant ANDREI OVIDIU AGACHE transmitted and agreed to transmit victim funds totaling approximately \$2,900 from Chicago, Illinois, to defendant GABRIEL DRAGOS TOADER in the vicinity of Sarasota, Florida.

31. It was further part of the scheme that on or about October 30, 2006, defendant RAUL BORLEA transmitted and agreed to transmit victim funds totaling approximately \$2,000 from the vicinity of Dallas, Texas to defendant GABRIEL DRAGOS TOADER in Chicago, Illinois.

32. It was further part of the scheme that between approximately March 5, 2007, and March 11, 2007, defendant MIRCEA ALIN BLAJ, aka "Hagiu Sorin"

and "Popa Claudiu," transmitted and agreed to transmit victim funds totaling approximately \$8,960 from the vicinity of Dallas, Texas, to defendant GABRIEL DRAGOS TOADER in the nation of Romania.

33. Beginning no later than approximately February 2008, and continuing until in or about March 6, 2008, defendant IGORI GOREACIUC, using aliases such as "Iv Brochet," "Kostas Koralis," and "Alexander Dore" agreed to receive, received, and attempted to receive Fraud Proceeds from banks that had been transmitted by victims of the scheme in interstate commerce to the vicinity of New York, New York.

34. It was further part of the scheme that on or about December 17, 2007, defendants GABRIEL DRAGOS TOADER and IGORI GOREACIUC caused an account in the name of "Kostas Koralis" to be opened at J.P. Morgan Chase Bank in New York, New York, for the receipt of fraud proceeds transmitted in interstate commerce by victims of the scheme.

35. On or about December 17, 2007, defendants GABRIEL DRAGOS TOADER and IGORI GOREACIUC caused funds in the amount of \$6,800 to be withdrawn from a J.P. Morgan Chase bank account in the vicinity of New York, New York, knowing that the funds consisted of Fraud Proceeds transmitted in interstate commerce by a victim of the scheme.

36. It was further part of the scheme that defendants misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the existence of the scheme, the purposes of the scheme, and acts done in furtherance of

the scheme.

37. On or about the dates set forth below, in the Northern District of Illinois, Eastern Division, and elsewhere, for the purpose of executing the scheme to defraud, the defendants set forth below knowingly caused to be transmitted by means of wire communication in interstate and foreign commerce, certain signs, signals, and sounds, namely, a wire transfer of funds in the amounts set forth below, each such transaction constituting a separate count of this indictment for the defendant named in each count:

Ct.	Defendant	Date	Amount	Transfer sent to/from
1	GABRIEL DRAGOS TOADER	11/10/05	\$ 19,500.00	Kazira LLC (Illinois to Cyprus)
2	GABRIEL DRAGOS TOADER	01/02/06	\$ 2,350.00	"Alexander Weindorf" (California to Illinois)
3	GABRIEL DRAGOS TOADER	02/22/06	\$ 5,050.00	Individual 1 (Illinois to Cyprus)
4	GABRIEL DRAGOS TOADER	05/25/06	\$ 9,900.00	AFMA Corporation (Illinois to Cyprus)
5	BELA BALINT, aka "Dan Ackerman"	07/19/05	\$ 1,500.00	Victim BH (Tennessee to Illinois)
6	BELA BALINT, aka "George Brown" and GABRIEL DRAGOS TOADER	09/27/05	\$ 1,300.00	Victim LS (California to Illinois)
7	BELA BALINT, aka "George Goodman" and GABRIEL DRAGOS TOADER	11/07/05	\$ 850.00	Victim TW (California to Illinois)
8	BELA BALINT, aka "Tony Sharp"	02/25/06	\$ 2,990.00	Victim ES (Florida to Illinois)
9	CRISTINA SAVU, aka "Dana Schawrzmann"	04/19/06	\$ 2,995.00	Victim RH (Utah to Illinois)

Ct.	Defendant	Date	Amount	Transfer sent to/from
10	CRISTINA SAVU, aka "Dana Shotzwann"	07/19/06	\$ 2,700.00	Victim HD (Louisiana to Illinois)
11	CRISTINA SAVU and GABRIEL DRAGOS TOADER	07/21/06	\$ 8,000.00	AFMA Corporation (Illinois to Cyprus)
12	CRISTINA SAVU, aka "Gretta Kollman"	10/25/06	\$ 2,900.00	Victim RV (Nevada to Illinois)
13	CRISTINA SAVU, aka "Michele Keolman"	11/02/06	\$ 2,900.00	Victim MP (Tennessee to Illinois)
14	CRISTINA SAVU, aka "Elena Kashimitros"	11/01/07	\$ 3,500.00	Victim RS (Vermont to Illinois)
15	IGORI GOREACIUC, aka "Alexander Berois"	07/31/06	\$ 2,900.00	Victim CR (Michigan to Illinois)
16	IGORI GOREACIUC, aka "Alexander Bengois"	08/09/06	\$ 2,900.00	Victim PM (Tennessee to Illinois)
17	IGORI GOREACIUC, aka "Alexander Bernois"	08/29/06	\$ 2,700.00	Victim JK (Kansas to Illinois)
18	IGORI GOREACIUC, aka "Alexander Vernois"	08/29/06	\$ 4,145.00	Victim JS (New York to Illinois)
19	IGORI GOREACIUC, aka "Robert Devi"	03/06/07	\$ 2,500.00	Victim BM (Illinois to Florida)
20	ADRIAN GHIGHINA, aka "Dan Anderson"	09/16/05	\$ 800.00	Victim AN (Wyoming to Illinois)
21	ADRIAN GHIGHINA, aka "Maurice Shuman"	09/28/05	\$ 3,000.00	Victim SC (Utah to Illinois)
22	ADRIAN GHIGHINA, aka "Dan Flinchum"	10/03/05	\$ 800.00	Victim JP (Nevada to Illinois)
23	ADRIAN GHIGHINA, aka "Dan Smith" and GABRIEL DRAGOS TOADER	11/02/05	\$ 850.00	Victim CM (Texas to Illinois)
24	ADRIAN GHIGHINA, aka "Dan Schaufmann"	02/14/06	\$ 3,200.00	Victim SH (Indiana to Illinois)
25	ADRIAN DUCA aka "Arthur Morris"	11/02/04	\$ 2,400.00	Victim BM (Arizona to Illinois)

Ct.	Defendant	Date	Amount	Transfer sent to/from
26	ADRIAN DUCA aka "Arthur Morris"	11/05/04	\$ 2,900.00	Victim GG (Indiana to Illinois)
27	ADRIAN DUCA aka "Joice Fetherling"	11/27/04	\$ 2,950.00	Victim WW (Pennsylvania to Illinois)
28	RAUL BORLEA and GABRIEL DRAGOS TOADER	10/05/06	\$ 8,415.00	AFMA Corporation (Illinois to Cyprus)
29	RAUL BORLEA and GABRIEL DRAGOS TOADER	11/07/06	\$ 8,000.00	AFMA Corporation (Illinois to Cyprus)
30	RAUL BORLEA aka "Michael Polaceks"	11/25/06	\$ 2,995.00	Victim PM (Pennsylvania to Texas)
31	RAUL BORLEA and GABRIEL DRAGOS TOADER	11/13/06	\$ 9,500.00	AFMA Corporation (Illinois to Cyprus)
32	MIRCEA ALIN BLAJ aka "Daniel Schmucker"	11/16/06	\$ 2,995.00	Victim HH (Virginia to Texas)
33	MIRCEA ALIN BLAJ aka "Popa Claudiu" and GABRIEL DRAGOS TOADER	03/07/07	\$ 2,030.00	Gabriel Dragos Toader (Texas to Romania)
34	MIRCEA ALIN BLAJ aka "Hagiu Sorin" and GABRIEL DRAGOS TOADER	03/11/07	\$ 2,900.00	Gabriel Dragos Toader (Texas to Romania)
35	CONSTANTIN PALANCEANU aka "Vladimir Igorov"	12/14/05	\$ 750.00	Victim MU (California to Illinois)
36	CONSTANTIN PALANCEANU aka "Paul Schneider"	01/10/06	\$ 2,950.00	Victim HM (Louisiana to Illinois)
37	CONSTANTIN PALANCEANU aka "Vlad Schulzer"	01/20/06	\$ 2,495.00	Victim WH (Wyoming to Illinois)
38	CONSTANTIN PALANCEANU aka "Joseph Ludovckys"	01/23/06	\$ 1,250.00	Victim SC (Missouri to Illinois)
39	CONSTANTIN PALANCEANU aka "Andrew Robenstein"	02/27/06	\$ 2,500.00	Victim TC (Ohio to Illinois)
40	CONSTANTIN PALANCEANU aka "Paul Drogen"	03/07/06	\$ 2,811.00	Victim BC (Oklahoma to Illinois)

Ct.	Defendant	Date	Amount	Transfer sent to/from
41	ANDREI OVIDIU AGAHCE aka "Paul Acker"	02/07/06	\$ 2,950.00	Victim NB (Louisiana to Illinois)
42	ANDREI OVIDIU AGAHCE aka "Paul Depner"	03/04/06	\$ 2,900.00	Victim KK (Ohio to Illinois)
43	ANDREI OVIDIU AGAHCE aka "Andrew Veres"	03/04/06	\$ 2,000.00	Victim RN (New York to Illinois)
44	ANDREI OVIDIU AGAHCE aka "Paul Verner"	03/24/06	\$ 2,990.00	Victim GG (Wisconsin to Illinois)
45	IOAN DANUT COITA aka "Mark Spadoni"	02/13/07	\$ 2,550.00	Victim DK (Florida to Texas)
46	IOAN DANUT COITA aka "Avi Dubrovitz"	03/03/07	\$ 2,990.00	Victim MS (Illinois to Texas)
47	IOAN DANUT COITA aka "Luigi Batoni"	03/22/07	\$ 2,000.00	Victim JL (California to Texas)
48	RAUL BORLEA	11/15/06	\$ 2,995.00	Victim TMH (Illinois to Texas)

In violation of Title 18, United States Code, Sections 1343 and 2.

FORFEITURE ALLEGATION

The SPECIAL JUNE 2007 GRAND JURY further charges:

1. The allegations contained in Counts One - Four, Six, Seven, Eleven, Twenty-Three, Twenty-Eight, Twenty-Nine, Thirty-One, Thirty-Three, and Thirty-Four of this Indictment are realleged and incorporated herein by reference for the purpose of alleging that certain property is subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. As a result of his violations of Title 18, United States Code, Section 1343, as alleged in the foregoing indictment,

GABRIEL DRAGOS TOADER,
also known as "Gabi Camatar"

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all right, title and interest in property, real and personal, which constitutes and is derived from proceeds traceable to the charged offense(s).

3. The interests of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section, 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) include but are not limited to funds in the amount of approximately \$2,700,000.

4. If any of the property subject to forfeiture and described above, as a result of any act or omission of the defendant:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value; or
- (e) Has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property, under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY